

EXHIBIT 108

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Billy M. Honor. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County in Georgia and my residence address is [REDACTED]
[REDACTED] Sandy Springs, Georgia 30350.
 - a. I am employed by the New Georgia Project, and in that role I work with faith-based organizations to help those ministries with their social justice work.
3. For the 2018 election cycle, I assisted Ebenezer Baptist Church (EBC), with their voter registration, voter education and get out the vote project. In 2018, EBC was forced to divert resources from its traditional voter registration and general get out the vote efforts, to work with helping church and community members ensure they had not been unknowingly purged from the voter registration rolls or otherwise prohibited or discouraged from voting.
4. I helped EBC by working with their staff to create programs and trainings for their members on how to avoid having members' votes suppressed or discounted.
5. The first program I help create was a Vote by Mail Campaign. I was worried that our members' votes would not be counted, and I knew the best way to track a person's vote is to do it by mail. We encouraged our members to vote by mail and trained them on how to request, complete and submit their absentee ballot by mail.
6. I was frustrated that this was a step we had to take because voting by mail is much more burdensome on a voter than walking in and out of a polling place. Voting by mail takes time and planning: it requires filling out forms, use of purchased items like envelopes and stamps, and requires the voter to track their vote online. These extra steps were necessary

and valuable to me and the people I worked with in order to ensure our members' votes were counted.

7. I trained EBC members on how they could check their own voting status online and where to find their registration information. I educated people to focus on the spelling of their name, their current address and their polling place to ensure there was no clerical error that could cause their vote to be discounted. At that time, I knew voters were getting purged from the registration rolls because of small errors, and I wanted people to find and fix those errors before heading to the polls.
8. The last topic I educated EBC members on was the rules for requesting a provisional ballot. I found that most people were unaware of the rules and procedures for casting a provisional ballot, and I wanted to make sure that if a voter faced a problem at a polling place, he or she could at least cast a ballot. My training informed voters to always request a provisional ballot if they were told by poll workers they could not otherwise vote.
9. Overall, I conducted at least two in person training sessions for church members, dozens of meetings with church staff, and placed countless phone calls, all working towards these training and program goals.
10. All of these efforts on behalf of EBC and its members resulted from the State's purge and voter suppression effort during the 2018 election cycle. In a similar role during the run up to the 2016 elections, I did not have to devote any of the time and resources on these basic issues of ensuring registered voters would be able to cast a valid ballot.
11. In 2016 I, along with the churches I supported, conducted standard social justice voting missions and programs, such as get out the vote and voter registration campaigns. During

the 2016 election, we did not have any of the issues and problems we saw in 2018.

Further, because of all the purge-prevention education efforts we undertook in the 2018 election, we were forced to divert resources from our more general get out the vote and voter registration campaigns. The diversion of time, money and effort had a substantial negative impact on EBC's ministry and social justice program the Church had planned on conducting.

12. On election day I traveled around metro Atlanta to observe how voting was going. I went to one polling site in the Pittsburgh community in Atlanta where I observed extremely long lines. This polling site was a majority racial minority polling site, and only two of the five voting machines were working all day.
13. I asked the poll manager at this polling site why the other three voting machines were not working, and she told me they did not have the equipment they needed to power them.
14. I watched as person after person left the long voting line. I asked several of them why they were leaving, and they said they could not wait any longer. Many told me they had to get to work. Many of the people who left the line expressed frustration with not being able to vote and felt this was intentional voter suppression. Many of the people who left before casting votes seemed upset, discouraged and angry.
15. I traveled around metro Atlanta and observed other similar voting issues—long lines, frustrated people leaving before casting votes, and equipment failures—at other polling places where the voters were majority minority voters.
16. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

17. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

18. I declare under penalty of perjury that the foregoing is true and correct

Further affiant sayeth not, this the 7th day of November, 2019.



A handwritten signature in black ink, appearing to read "Billy Michael Honor".

Signature

Billy Michael Honor